

SORLING NORTHRUP
Patrick M. Ryan (NY #540835)
1 N. Old State Capitol, Suite 200
P.O. Box 5131
Springfield, IL 62705-5131
Telephone: 217-544-1144
Facsimile: 217-522-3173
Email: pmryan@sorlinglaw.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:) Chapter 11
)
SEARS HOLDINGS CORPORATION, *et al.*,) Case No. 18-23538 (RDD)
) (Jointly Administered)
Debtors.)
)
)

NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES

PLEASE TAKE NOTICE that the undersigned appears as counsel for CHARLES PUGH, NICOLE PUGH, JACK PUGH, SAM PUGH, and CHARLES F. PUGH (the "Notice Parties"), and, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010, and 9013, and sections 102(1), 342, and 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") requests that all notices given or required to be given in this case or any related adversary proceeding, be given to and served upon the undersigned at the address set forth below.

PLEASE TAKE FURTHER NOTICE that request is also hereby made for service of copies of all papers, including but not limited to reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers, whether formal or informal, filed in this case or any related adversary proceeding by mailing one copy of each, unless otherwise directed by the Court, to the following:

Sorling Northrup
David A. Rolf (IL ARDC #6196030)
Patrick M. Ryan (NY #540835)
1 N. Old State Capitol, Suite 200
P.O. Box 5131
Springfield, IL 62705-5131
Telephone: 217-544-1144
Facsimile: 217-522-3173
Email: darolf@sorlinglaw.com
pmryan@sorlinglaw.com

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any former or later pleading, claim, or suit shall waive or be deemed or construed to waive any right of the Notice Parties, including without limitation their right to (i) have final orders in non-core matters entered only after de novo review by a higher court, (ii) to trial by jury in any proceeding or matter in this case, or any case, controversy, or proceeding related to this case, whether or not the same can be designated legal or private rights, notwithstanding the designation of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2), (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, and/or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which the Notice Party is or may be entitled under agreements, in law or in equity or under the United States Constitution, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved and preserved unto the Notice Parties without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: December 5, 2018
Springfield, Illinois

/s/ Patrick M. Ryan
Patrick M. Ryan (NY #540835)
Sorling Northrup
1 N. Old State Capitol, Suite 200
P.O. Box 5131
Springfield, IL 62705-5131
Telephone: 217-544-1144
Fax: 217-522-3173
E-Mail: pmryan@sorlinglaw.com